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Keenan & Associates, P.A.; Keenan's Kids Foundation, Inc.,
David J. Hoey, and William Entrekin*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SEAN K. CLAGGETT & ASSOCIATES,
LLC DBA CLAGGETT & SYKES LAW
FIRM, A NEVADA LIMITED LIABILITY
COMPANY; SEAN CLAGGETT, AN
INDIVIDUAL,

Plaintiffs,

vs.

DON C. KEENAN, AN INDIVIDUAL; D.C.
KEENAN & ASSOCIATES, P.A. D/B/A
KEENAN LAW FIRM, A GEORGIA
PROFESSIONAL ASSOCIATION;
KEENAN'S KIDS FOUNDATION, INC.,
D/B/A KEENAN TRIAL INSTITUTE
AND/OR THE KEENAN EDGE, A
GEORGIA NON-PROFIT CORPORATION;
BRIAN F. DAVIS, AN INDIVIDUAL;
DAVIS LAW GROUP, P.A., A NORTH
CAROLINA PROFESSIONAL
ASSOCIATION; DAVID J. HOEY, AN
INDIVIDUAL; TRAVIS E. SHELTER, AN
INDIVIDUAL; WILLIAM ENTREKIN, AN
INDIVIDUAL; DOES I-X; AND ROE
BUSINESS ENTITIES XI-XX, INCLUSIVE,

Defendants.

CASE NO. 2:21-cv-02237-GMN-DJA

**DECLARATION OF WILLIAM
ENTREKIN**

1 I, WILLIAM ENTREKIN, hereby state and declare as follows:

2 1. My name is William Entrekin. I am one of the named defendants in this action. I
3 am over the age of 18, suffering from no legal disabilities, and fully competent to give this
4 declaration.

5 2. I have personal knowledge of the facts set out in this declaration, which I submit
6 on my own behalf in support of the Motion to Dismiss filed by me and co-defendants Don C.
7 Keenan; D.C. Keenan & Associates, P.A. d/b/a Keenan Law Firm ("Keenan Law Firm");
8 Keenan's Kids Foundation, Inc., d/b/a Keenan Trial Institute and/or The Keenan's Edge
9 ("Keenan Trial Institute"); and David Hoey.

10 3. I am, and at all times relevant to the complaint in this matter was, a resident and
11 citizen of, and domiciled, in Dahlonga, Georgia, a city located approximately sixty-five miles
12 north of Atlanta.

13 4. I have been employed by co-defendant the Keenan Law Firm for over nine and a
14 half years, serving initially as Executive Assistant beginning in July 2012 and four months later
15 becoming Director of Operations in October 2012, a position that I have held continuously since
16 then.

17 5. Keenan Law Firm is a Florida professional association having offices located
18 at 148 Nassau Street NW, Atlanta, Georgia 30303 and at 174 Watercolor Way, Suite 103,
19 Box 339, Santa Rosa Beach, Florida 32459.

20 6. I primarily work from the Atlanta office of Keenan Law Firm, and prior to the
21 start of the pandemic I would travel to the Florida office two to three times a year.

22 7. Prior to joining Keenan Law Firm, I served for over twenty-three and a half years
23 as Security Officer for the US Navy, of which I am a veteran.

24 8. I am not an attorney, and my experiences in the legal services industry for Keenan
25 Law Firm have consisted only of administration and operations management.

26 9. I have only been to the state of Nevada once when in or around 2003, while I was
27 stationed with the Navy in San Diego, I spent a vacation weekend in Las Vegas staying at a
28 hotel at Nellis Air Force Base and visiting the city.

1 10. I have not lived, worked, or otherwise engaged in any persistent course of conduct
2 in Nevada.

3 11. The Complaint in the Nevada Action alleges only that, on April 27, 2020, I sent
4 an email from co-defendant David Hoey through Listserv to lawyers across the country
5 (the "April 27 Email").

6 12. Listserv is an application that distributes messages to subscribers on an electronic
7 mailing list.

8 13. My only activities with respect to the April 27 Email consisted of my sending the
9 content of the email in my capacity as Director of Operations of Keenan Law Firm to the
10 recipients of that electronic mailing list. I did not create, draft, or approve the content of the
11 April 27 Email. All my actions occurred from within the state of Georgia, not Nevada. The
12 April 27 Email allegedly forms the basis of the First, Second, and Third Counts of the Complaint
13 which are the only counts of the Complaint that name me as an individual defendant.

14 14. I am not named as an individual defendant on the Fourth, Fifth, and Sixth Counts
15 of the Complaint (for intentional interference with contract, conspiracy, and veil piercing) which
16 allegedly arise from the purported termination of an attorney-client relationship between
17 plaintiffs and a third party. I was not involved in any way with the subject of the purported
18 termination of the attorney-client relationship.

19 15. As alleged in plaintiffs' Nevada Complaint, the April 27 Email was sent to all state
20 Edge listservs around the country (not uniquely to the Nevada listserv). The listserv is not open
21 to the general public, but instead is a closed environment of lawyers who have served as
22 instructors, students, or otherwise attended or participated in an event or seminar hosted by
23 Keenan Trial Institute. The April 27 Email was sent after the filing of the Georgia Action, and
24 the allegedly defamatory matter concerned, and was pertinent to, the Georgia litigation. [Compl.
25 at ¶¶ 49-50]

26 16. I have never owned, leased, or otherwise occupied any real property in Nevada.

27 17. I have never had any personal property located in Nevada.
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1 18. I have never maintained any offices, other facilities, or agents, or had any
2 employees in the state of Nevada.

3 19. I have never served as an agent or had a registered agent for service of process in
4 the state of Nevada.

5 20. I have never had a bank account in Nevada. Nor have I ever filed any financing
6 statements, borrowed any money, or maintained any banking relationship in Nevada.

7 21. I have never had a telephone listing or mailing address in Nevada.

8 22. I have never incurred or paid any taxes in Nevada; nor have I ever filed any tax
9 return in Nevada.

10 23. I have no employees or independent contractors in Nevada.

11 24. I have never advertised in the state of Nevada.

12 25. Except for this case, I have never been a party to litigation in any state or federal
13 court in Nevada.

14 26. I have never committed any torts or other wrongdoing in whole in in part in
15 Nevada. Nor do plaintiffs in their Nevada Complaint allege any tortious acts or other
16 wrongdoing by me in Nevada.

17 27. Individuals who may serve as witnesses for me on which I may rely to support my
18 defenses or claims include me, Mr. Keenan, Mr. Hoey, and Mindy Bish, among others, all who
19 are located in Georgia, Florida, or Massachusetts, outside the state of Nevada. Additionally, the
20 documents relevant to this litigation are located in Georgia and Florida.

21 28. I would be significantly inconvenienced to have to defend this action nearly
22 2,000 miles from my home base in Georgia. It would be much easier for me to litigate this
23 matter in the Northern District of Georgia (Atlanta Division) where my employer the Keenan
24 Law Firm has an office, I am domiciled, amenable to and would accept service, and witnesses
25 and documents related to this litigation are located.

1 I declare under penalty of perjury under the law of the state of Nevada that the foregoing
2 is true and correct.

3 Executed on December 29, 2021 in Dahlonega, Georgia.

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5 By: /s/ William Entrekin
6 William Entrekin
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Pisanelli Bice PLLC and that on the 29th day of December, 2021, and pursuant to Fed. R. Civ. P. 5, a copy of the foregoing DECLARATION OF WILLIAM ENTREKIN was served via the Court's electronic filing system to the parties listed below:

Jared B. Anderson, Esq.
David J. Churchill, Esq.
Injury Lawyers of Nevada
4001 Meadows Lane
Las Vegas, Nevada 89107

/s/ Kimberly Peets
An Employee of Pisanelli Bice PLLC